

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-10943 (MEW)
)
) (Jointly Administered)
)

**ORDER
(I) APPROVING FIRST AMENDED LIQUIDATION PROCEDURES
AND (II) GRANTING RELATED RELIEF**

Upon the First Amended Liquidation Procedures (the “First Amended Liquidation Procedures”)² filed by the Plan Administrator (as defined in the Plan) pursuant to the *Third Amended Joint Plan of Voyager Digital Holdings, Inc. And Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code*, (the “Plan”), attached as Exhibit A to the *Corrected and Amended Order (I) Approving the Second Amended Disclosure Statement and (II) Confirming the Third Amended Joint Plan of Voyager Digital Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (the “Confirmation Order”) [Docket No. 1166] and approved by this order (the “Order”); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, entered February 1, 2012; and this Court having the power to enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Liquidation Procedures in this district is proper pursuant

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital, Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Liquidation Procedures.

to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the First Amended Liquidation Procedures are in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Debtors' notice of the First Amended Liquidation Procedures and opportunity for a hearing on the First Amended Liquidation Procedures were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the First Amended Liquidation Procedures [and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing")]; and this Court having determined that the legal and factual bases set forth in the First Amended Liquidation Procedures[and at the Hearing] establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The First Amended Liquidation Procedures are approved pursuant to this Order.
2. The Plan Administrator is authorized to take all actions necessary to effectuate the First Amended Liquidation Procedures.
3. Notice of the First Amended Liquidation Procedures as provided therein is good and sufficient and the requirements of the Local Rules are satisfied by such notice.
4. The Plan Administrator may file a motion at any time seeking to modify the First Amended Liquidation Procedures. Parties shall have seven calendar days to file an objection to any motion by the Plan Administrator seeking to modify the First Amended Liquidation Procedures. If an objection to such motion is filed, the Court will hold a hearing to consider such motion.

5. The terms and conditions of this Order shall be immediately effective and enforceable upon entry of the Order.

6. The Confirmation Order remains in full force and effect, subject to the District Court proceeding, and shall apply to the Plan.

New York, New York

Dated: _____, 2023

THE HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE